Intrusive Investigation Work Plan - Former La Quinta Property
David Wilson
to:
Brent Everett (beverett@utah.gov), Bill Rees (brees@utah.gov), Joyce Ackerman
11/05/2009 10:36 AM
Cc:
Robert Schmidt
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From: David Wilson <David.Wilson@erm.com>

To: "Brent Everett (beverett@utah.gov)" <beverett@utah.gov>, "Bill Rees (brees@utah.gov)" <brees@utah.gov>, Joyce Ackerman/R8/USEPA/US@EPA

Cc: Robert Schmidt <Robert@pegdevelopment.com>

2 Attachments

Investigation Work Plan.pdf 0916-002-09-FIG2.pdf

Hello Joyce, Brent and Bill:

As per our meeting last week regarding investigation activities at the former La Quinta property, we agreed to prepare a general Workplan to fulfill the requirements of the Environmental Covenant. Attached is a Workplan for this purpose, and we acknowledge that a more detailed Workplan will be developed for more cover (cap) disruptive earthwork activities that will be part of the overall site development. I am also providing a boring layout for the geotechnical investigation program provided by the Bill Gordon, the geotechnical engineer supporting EA Land Investment.

We would appreciate your prompt review and approval/comments, as appropriate. Please call me if you have any questions.

Regards,
Dave

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Memorandum

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To: Bill Rees and Brent Everett, UDEQ-DERR
Ms. Joyce Ackerman, EPA R8

From: David Wilson, ERM

Date: November 4, 2009

Subject: Workplan for Intrusive Investigations
Former LaQuinta Property
100 South 300 West, Salt Lake City, Utah

ERM®

Environmental Resources Management (ERM) has prepared this brief Workplan on behalf of EA Land Investment, LLC (EA Land), to describe the procedures to be followed during intrusive investigations at the former LaQuinta property located at the southwest comer of 100 South and 300 West in downtown Salt Lake City. As per our Project Initiation Meeting on October 29, 2009, we have prepared this brief Workplan to describe the types of investigation activities that may be performed and control measures to meet the requirements of the Environmental Covenant described below.

Introduction

Based on site environmental investigations completed by ERM in 2005 and Wasatch Environmental in 2009, asbestos contamination at the site has been observed in soil at depths shallower than 10 feet below ground surface (bgs). Due to the apparent random distribution of impacts across the site, all soil between zero to 10 feet bgs shall be assumed to contain asbestos contamination for the purpose of subsurface investigation.

The property is subject to an Environmental Covenant entered into by LaQuinta Corporation (the former property owner), the U.S. Environmental Protection Agency (EPA), and the Utah Department of Environmental Quality (UDEQ). The Environmental Covenant prescribes measures to prevent the release of amphibole asbestos, and is binding upon all successors in property ownership. Per the Environmental Covenant, any disturbance of the asphalt and/or concrete covers that cap the site requires measures to protect workers and potential nearby receptors, and to not introduce amphibole asbestos contamination into clean areas.

The intrusive subsurface investigation activities described herein would result in minor disturbance to the cap at discrete locations. This

memorandum is intended to provide protective protocols only for the investigative drilling work described herein. It does not address earthwork or any large-scale disturbance to the cap; such construction activities will be addressed by a separate workplan to be submitted to EPA and UDEQ for review and approval prior to major earthwork activities for land redevelopment.

Scope of Work

Intrusive subsurface soil sampling may be required prior to site development to facilitate characterization of site soils for environmental or geotechnical purposes. Types of intrusive sampling activities may include completion of soil borings using direct-push ("GeoProbe") equipment or hollow-stem augers with split spoon samplers. Both of these drilling techniques would result in a small (2 to 6 inch diameter) holes in the asphalt or concrete on the property. Subsurface soil samples collected from the borings would be logged and/or submitted to laboratories for testing. The soil sampling devices used for these drilling methods include plastic sleeves (for GeoProbe) and split spoons for hollow-stem auger drilling. Both sampling devices allow collection of relatively undisturbed soil samples from the subsurface environment with limited potential for exposures to workers or nearby receptors.

Safe Work Practices

The following minimum work practices will be followed to protect workers and to prevent potential liberation of asbestos from soil at the site during these activities:

- Personal Protective Equipment (PPE) including half face negative pressure respirator with HEPA filter during drilling activities between 0 to 10 feet bgs

- Barricades or other measures will be employed to prevent unauthorized access by the public during intrusive subsurface investigation activities.

- Drilling methods will be selected and performed to minimize the potential generation of dust during drilling. Methods such as hollow-stem augers or direct-push ("GeoProbe") drilling have a low potential for dust generation.

- Soils and gravel will be wetted and kept wet to reduce dust generation.

- Cuttings from 0 to 10 feet bgs will be placed in drums or 5-gallon buckets, covered, and stored on-site for management with potential asbestos-containing material to be generated during future development activities at the Site. Drums or bucket containing investigation-derived soil will be clearly labeled, *"NON-HAZARDOUS WASTE, INVESTIGATION-DERIVED SOIL, POTENTIALLY CONTAINING ASBESTOS,"* along with the contact information for the generator. Preferably, the drums or buckets will be stored indoors in a secured area, are at least in the secured area adjacent to the on-site building.

- Upon completion of the soil borings, the holes at depths of 10 feet or greater will be allowed to close naturally upon removal of the drilling rods and augers, or they will be filled with clean soil cuttings or bentonite pellets. All materials removed from the upper 10 feet will be placed in containers as described above.

- Asphalt and concrete surfaces will be repaired to pre-existing conditions upon completion of intrusive sampling activities at each sampling location.

- Equipment coming into contact with the soil within the upper 10 feet of the ground surface will be properly packaged for disposal at a solid waste landfill that accepts asbestos-containing materials, and/or decontaminated using a thorough rinse procedure to remove visible soil and potential asbestos. Decontamination residues will be placed in drums or buckets and stored on site as described above.

Notifications

EPA and UDEQ will be notified regarding dates of proposed intrusive sampling activities when the cap is to be disturbed. The notification will include the number and locations of proposed boring locations. Following completion of sampling activities, EPA and UDEQ will be notified of the activities completed and the subsequent repairs to the cap at the site.

We thank you for reviewing this Workplan, and providing agency approval and/or comments promptly to facilitate potential site investigation activities.

Copy: Mr. Robert Schmidt, PEG Development

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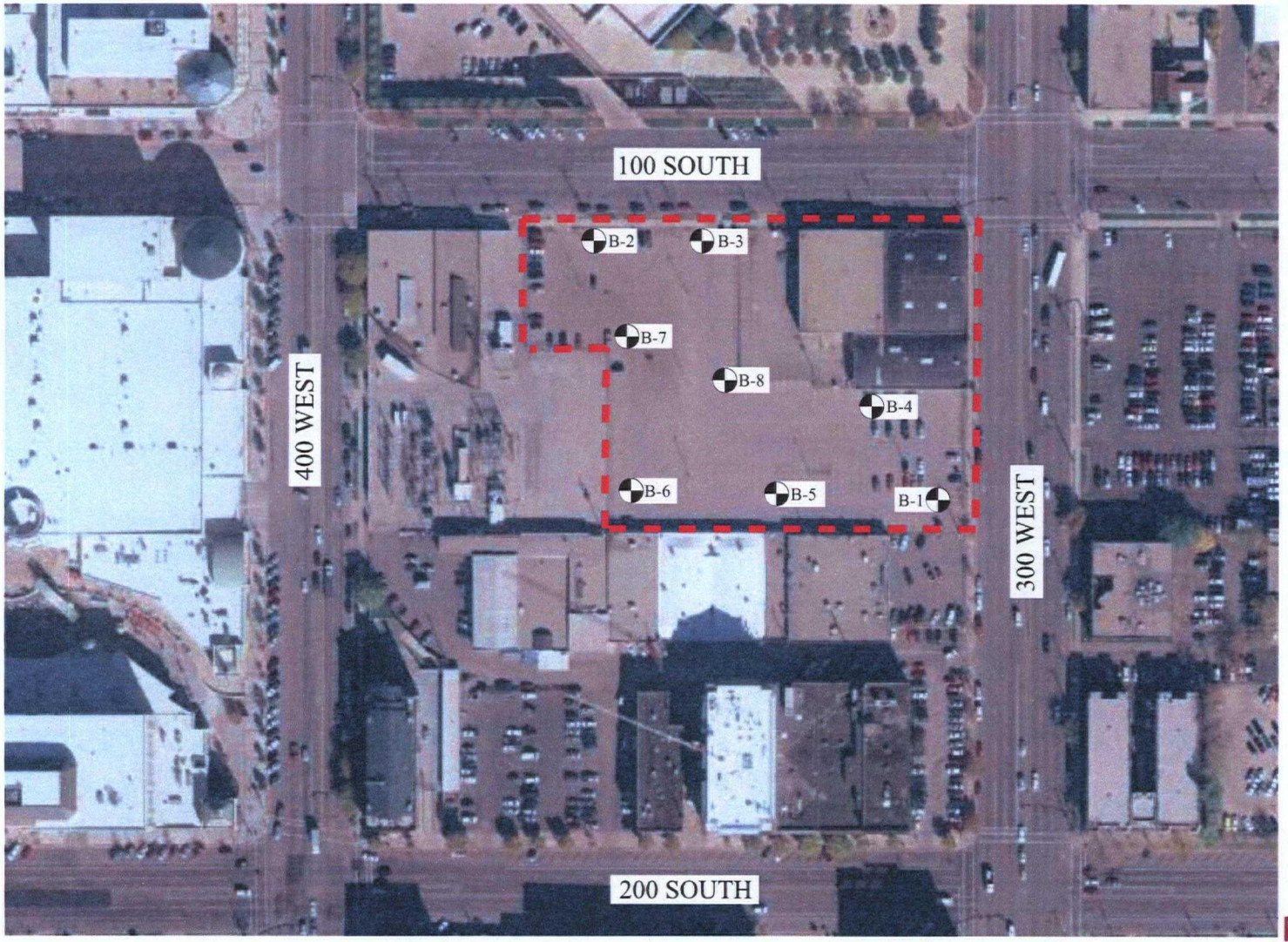
JOB NO. 0916-002-09



REFERENCE:
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NOT TO SCALE

FIGURE 2
SITE PLAN

GSH
Gordon Spilker Huber
Geotechnical Consultants, Inc.